

# **Exhibit 1**

## Carey Miller

---

**From:** Bryan Tyson <btyson@taylorenghish.com>  
**Sent:** Friday, January 21, 2022 4:59 PM  
**To:** Amanda Bradley; Cross, David D.; Gavin Palmer; Carey Miller; Alexander Denton; bbrown@brucepbrownlaw.com; Bryan Jacoutot; Brian Lake; cheryl.ringer@fultoncountyga.gov; cichter@ichterdavis.com; david.lowman@fultoncountyga.gov; Dal Burton; Diane LaRoss; Elson, Hannah R.; hknapp@khlawfirm.com; James Balli; Josh Belinfante; Jonathan Crumly; Javier Pico-Prats; kaye.burwell@fultoncountyga.gov; Loree Anne Paradise; Melanie Johnson; Kaiser, Mary; ram@lawram.com; sparks@khlawfirm.com; Ascarrunz, Veronica; Vincent Russo; Conaway, Jenna B.  
**Cc:** Harry Martin  
**Subject:** RE: 17-cv-02989-AT Curling et al v. Raffensperger et al

Ms. Bradley:

Thank you for the assistance with these depositions.

One other issue has arisen with the Secretary's 30(b)(6) deposition and the Coalition Plaintiffs that will require the Court's resolution. Yesterday evening, Coalition Plaintiffs provided additional topics for the 30(b)(6) of the Secretary's office, which was the first time the Coalition had sent topics separately from Curling Plaintiffs. (Curling Plaintiffs take no position on this issue.) State Defendants understood Plaintiffs would be conducting a joint deposition and do not intend to permit multiple 30(b)(6) depositions in the same case.

State Defendants have no objection to moving forward on the notice that was previously discussed on the schedule the Court outlined below. But if State Defendants must also prepare witnesses for the additional topics Coalition Plaintiffs served yesterday, we will require additional time to do so. We would appreciate direction from the Court about how to proceed.

Thanks,

Bryan



**Bryan P. Tyson**

**Taylor English Duma LLP** | 1600 Parkwood Circle, Suite 200, Atlanta, GA 30339

P: 678.336.7249 | M: 404.219.3160 | btyson@taylorenghish.com

[Website](#) | [vCard](#) | [LinkedIn](#) | [Twitter](#)

**Ask Me About Our TED Tenet of the Week: See Feedback as a Gift.**

Click [here](#) to learn more about our TED Tenets.

[Georgia Legal Awards Litigation Department of the Year](#)

California | Florida | Georgia | Illinois | Indiana | Michigan | North Carolina | Pennsylvania | Tennessee | Texas | Washington

This communication (together with all attachments) may contain privileged or confidential information, and its sender reserves and asserts all rights that may apply to it. If you are not the intended recipient or believe that you have received this communication in error, please do not print, copy, retransmit, disseminate or otherwise use the information. Also, please indicate to the sender that you have received this communication in error and delete the copy you received. If you have not executed an engagement letter with this firm, we do not represent you as your attorney and no duties are intended or created by this communication. Most legal rights have time limits, and this e-mail does not constitute advice on the application of limitation periods unless otherwise so expressly stated.

**From:** Amanda Bradley <Amanda\_Bradley@gand.uscourts.gov>

**Sent:** Friday, January 21, 2022 2:54 PM

**To:** Cross, David D. <DCross@mofo.com>; Gavin Palmer <Gavin\_Palmer@gand.uscourts.gov>; Carey Miller <carey.miller@robbinsfirm.com>; Alexander Denton <Alexander.Denton@robbinsfirm.com>;

bbrown@brucepbrownlaw.com; Bryan Jacoutot <bjacoutot@taylorenghish.com>; Brian Lake <Brian.Lake@robbinsfirm.com>; Bryan Tyson <btyson@taylorenghish.com>; cheryl.ringer@fultoncountyga.gov; cichter@ichterdavis.com; david.lowman@fultoncountyga.gov; Dal Burton <dburton@taylorenghish.com>; Diane LaRoss <dlaross@taylorenghish.com>; Elson, Hannah R. <HElson@mofo.com>; hknapp@khlawfirm.com; James Balli <jballi@taylorenghish.com>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; Jonathan Crumly <jcrumly@taylorenghish.com>; Javier Pico-Prats <javier.picoprats@robbinsfirm.com>; kaye.burwell@fultoncountyga.gov; Loree Anne Paradise <lparadise@taylorenghish.com>; Melanie Johnson <melanie.johnson@robbinsfirm.com>; Kaiser, Mary <MKaiser@mofo.com>; ram@lawram.com; sparks@khlawfirm.com; Ascarrunz, Veronica <VAscarrunz@mofo.com>; Vincent Russo <vrusso@robbinsfirm.com>; Conaway, Jenna B. <JConaway@mofo.com>

**Cc:** Harry Martin <Harry\_Martin@gand.uscourts.gov>

**Subject:** RE: 17-cv-02989-AT Curling et al v. Raffensperger et al

Counsel,

The Curling Plaintiffs and State Defendants may postpone the depositions as described in Mr. Cross's email.

Regards,  
Amanda

--

**Amanda D. Bradley, Esq.**

Law Clerk

Chambers of the Honorable Amy Totenberg

United States District Court

Northern District of Georgia

[amanda\\_bradley@gand.uscourts.gov](mailto:amanda_bradley@gand.uscourts.gov)

---

**From:** Cross, David D. <[DCross@mofo.com](mailto:DCross@mofo.com)>

**Sent:** Friday, January 21, 2022 2:07 PM

**To:** Gavin Palmer <[Gavin\\_Palmer@gand.uscourts.gov](mailto:Gavin_Palmer@gand.uscourts.gov)>; Carey Miller <[carey.miller@robbinsfirm.com](mailto:carey.miller@robbinsfirm.com)>; Amanda Bradley <[Amanda\\_Bradley@gand.uscourts.gov](mailto:Amanda_Bradley@gand.uscourts.gov)>; Alexander Denton <[Alexander.Denton@robbinsfirm.com](mailto:Alexander.Denton@robbinsfirm.com)>; [bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com); [bjacoutot@taylorenghish.com](mailto:bjacoutot@taylorenghish.com); Brian Lake <[Brian.Lake@robbinsfirm.com](mailto:Brian.Lake@robbinsfirm.com)>; [btyson@taylorenghish.com](mailto:btyson@taylorenghish.com); [cheryl.ringer@fultoncountyga.gov](mailto:cheryl.ringer@fultoncountyga.gov); [cichter@ichterdavis.com](mailto:cichter@ichterdavis.com); [david.lowman@fultoncountyga.gov](mailto:david.lowman@fultoncountyga.gov); [dburton@taylorenghish.com](mailto:dburton@taylorenghish.com); [dlaross@taylorenghish.com](mailto:dlaross@taylorenghish.com); Elson, Hannah R. <[HElson@mofo.com](mailto:HElson@mofo.com)>; [hknapp@khlawfirm.com](mailto:hknapp@khlawfirm.com); [jballi@taylorenghish.com](mailto:jballi@taylorenghish.com); Josh Belinfante <[Josh.Belinfante@robbinsfirm.com](mailto:Josh.Belinfante@robbinsfirm.com)>; [jcrumly@taylorenghish.com](mailto:jcrumly@taylorenghish.com); Javier Pico-Prats <[javier.picoprats@robbinsfirm.com](mailto:javier.picoprats@robbinsfirm.com)>; [kaye.burwell@fultoncountyga.gov](mailto:kaye.burwell@fultoncountyga.gov); [lparadise@taylorenghish.com](mailto:lparadise@taylorenghish.com); Melanie Johnson <[melanie.johnson@robbinsfirm.com](mailto:melanie.johnson@robbinsfirm.com)>; Kaiser, Mary <[MKaiser@mofo.com](mailto:MKaiser@mofo.com)>; [ram@lawram.com](mailto:ram@lawram.com); [sparks@khlawfirm.com](mailto:sparks@khlawfirm.com); Ascarrunz, Veronica <[VAscarrunz@mofo.com](mailto:VAscarrunz@mofo.com)>; Vincent Russo <[vrusso@robbinsfirm.com](mailto:vrusso@robbinsfirm.com)>; Conaway, Jenna B. <[JConaway@mofo.com](mailto:JConaway@mofo.com)>

**Cc:** Harry Martin <[Harry\\_Martin@gand.uscourts.gov](mailto:Harry_Martin@gand.uscourts.gov)>

**Subject:** RE: 17-cv-02989-AT Curling et al v. Raffensperger et al

**CAUTION - EXTERNAL:**

Mr. Palmer -

Curling Plaintiffs and State Defendants have conferred further and have agreed, subject to the Court's approval, also to postpone the 30b6 deposition of the Secretary's Office until after the Court resolves the Fortalice issue. Specifically, the parties have agreed on the following deposition dates: Mr. Beaver February 2 and the SOS 30b6 witnesses February 3-4. Please let us know at your earliest convenience if this is okay with the Court. The 30b6 is currently scheduled to begin next Tuesday.

Best,  
DC

---

**From:** Gavin Palmer <[Gavin\\_Palmer@gand.uscourts.gov](mailto:Gavin_Palmer@gand.uscourts.gov)>

**Date:** Wednesday, Jan 19, 2022, 7:44 PM

**To:** Cross, David D. <[DCross@mofo.com](mailto:DCross@mofo.com)>, Carey Miller <[carey.miller@robbinsfirm.com](mailto:carey.miller@robbinsfirm.com)>, Amanda Bradley <[Amanda\\_Bradley@gand.uscourts.gov](mailto:Amanda_Bradley@gand.uscourts.gov)>, Alexander Denton <[Alexander.Denton@robbinsfirm.com](mailto:Alexander.Denton@robbinsfirm.com)>, [bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com) <[bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com)>, [bjacoutot@taylorenghish.com](mailto:bjacoutot@taylorenghish.com) <[bjacoutot@taylorenghish.com](mailto:bjacoutot@taylorenghish.com)>, Brian Lake <[Brian.Lake@robbinsfirm.com](mailto:Brian.Lake@robbinsfirm.com)>, [btyson@taylorenghish.com](mailto:btyson@taylorenghish.com) <[btyson@taylorenghish.com](mailto:btyson@taylorenghish.com)>, [cheryl.ringer@fultoncountyga.gov](mailto:cheryl.ringer@fultoncountyga.gov) <[cheryl.ringer@fultoncountyga.gov](mailto:cheryl.ringer@fultoncountyga.gov)>, [cichter@ichterdavis.com](mailto:cichter@ichterdavis.com) <[cichter@ichterdavis.com](mailto:cichter@ichterdavis.com)>, [david.lowman@fultoncountyga.gov](mailto:david.lowman@fultoncountyga.gov) <[david.lowman@fultoncountyga.gov](mailto:david.lowman@fultoncountyga.gov)>, [dburton@taylorenghish.com](mailto:dburton@taylorenghish.com) <[dburton@taylorenghish.com](mailto:dburton@taylorenghish.com)>, [dlaross@taylorenghish.com](mailto:dlaross@taylorenghish.com) <[dlaross@taylorenghish.com](mailto:dlaross@taylorenghish.com)>, Elson, Hannah R. <[HElson@mofo.com](mailto:HElson@mofo.com)>, [hknapp@khlawfirm.com](mailto:hknapp@khlawfirm.com) <[hknapp@khlawfirm.com](mailto:hknapp@khlawfirm.com)>, [jballi@taylorenghish.com](mailto:jballi@taylorenghish.com) <[jballi@taylorenghish.com](mailto:jballi@taylorenghish.com)>, Josh Belinfante <[Josh.Belinfante@robbinsfirm.com](mailto:Josh.Belinfante@robbinsfirm.com)>, [jcrumly@taylorenghish.com](mailto:jcrumly@taylorenghish.com) <[jcrumly@taylorenghish.com](mailto:jcrumly@taylorenghish.com)>, Javier Pico-Prats <[javier.picoprats@robbinsfirm.com](mailto:javier.picoprats@robbinsfirm.com)>, [kaye.burwell@fultoncountyga.gov](mailto:kaye.burwell@fultoncountyga.gov) <[kaye.burwell@fultoncountyga.gov](mailto:kaye.burwell@fultoncountyga.gov)>, [lparadise@taylorenghish.com](mailto:lparadise@taylorenghish.com) <[lparadise@taylorenghish.com](mailto:lparadise@taylorenghish.com)>, Melanie Johnson <[melanie.johnson@robbinsfirm.com](mailto:melanie.johnson@robbinsfirm.com)>, Kaiser, Mary <[MKaiser@mofo.com](mailto:MKaiser@mofo.com)>, [ram@lawram.com](mailto:ram@lawram.com) <[ram@lawram.com](mailto:ram@lawram.com)>, [sparks@khlawfirm.com](mailto:sparks@khlawfirm.com) <[sparks@khlawfirm.com](mailto:sparks@khlawfirm.com)>, Ascarrunz, Veronica <[VAscarrunz@mofo.com](mailto:VAscarrunz@mofo.com)>, Vincent Russo <[vrusso@robbinsfirm.com](mailto:vrusso@robbinsfirm.com)>, Conaway, Jenna B. <[JConaway@mofo.com](mailto:JConaway@mofo.com)>

**Cc:** Harry Martin <[Harry\\_Martin@gand.uscourts.gov](mailto:Harry_Martin@gand.uscourts.gov)>

**Subject:** RE: 17-cv-02989-AT Curling et al v. Raffensperger et al

**External Email**

---

Counsel,

In light of the parties' agreement, the Curling Plaintiffs may have until February 4, 2022 to conduct Mr. Beaver's deposition. Additionally, the State Defendants may have until January 24 at 10:00 A.M. to file their supplemental brief referenced in this afternoon's Order and the Curling Plaintiffs may have until 10:00 A.M. on January 25.

Gavin Palmer  
Law Clerk  
Chambers of the Honorable Amy Totenberg  
United States District Court for the Northern District of Georgia  
404-215-1436  
[Gavin\\_Palmer@gand.uscourts.gov](mailto:Gavin_Palmer@gand.uscourts.gov)

---

**From:** Cross, David D. <[DCross@mofo.com](mailto:DCross@mofo.com)>

**Sent:** Wednesday, January 19, 2022 4:45 PM

**To:** Carey Miller <[carey.miller@robbinsfirm.com](mailto:carey.miller@robbinsfirm.com)>; Gavin Palmer <[Gavin\\_Palmer@gand.uscourts.gov](mailto:Gavin_Palmer@gand.uscourts.gov)>; Amanda Bradley

<Amanda\_Bradley@gand.uscourts.gov>; Alexander Denton <Alexander.Denton@robbinsfirm.com>;  
bbrown@brucepbrownlaw.com; bjacoutot@taylorenghish.com; Brian Lake <Brian.Lake@robbinsfirm.com>;  
btyson@taylorenghish.com; cheryl.ringer@fultoncountyga.gov; cichter@ichterdavis.com;  
david.lowman@fultoncountyga.gov; dburton@taylorenghish.com; dlaross@taylorenghish.com; Elson, Hannah R.  
<HElson@mofo.com>; hknapp@khlawfirm.com; jballi@taylorenghish.com; Josh Belinfante  
<Josh.Belinfante@robbinsfirm.com>; jcrumly@taylorenghish.com; Javier Pico-Prats <javier.picoprats@robbinsfirm.com>;  
kaye.burwell@fultoncountyga.gov; lparadise@taylorenghish.com; Melanie Johnson  
<melanie.johnson@robbinsfirm.com>; Kaiser, Mary <MKaiser@mofo.com>; ram@lawram.com; sparks@khlawfirm.com;  
Ascarrunz, Veronica <VAscarrunz@mofo.com>; Vincent Russo <vrusso@robbinsfirm.com>; Conaway, Jenna B.  
<JConaway@mofo.com>

Cc: Harry Martin <Harry\_Martin@gand.uscourts.gov>

Subject: RE: 17-cv-02989-AT Curling et al v. Raffensperger et al

**CAUTION - EXTERNAL:**

Mr. Palmer -

The parties agree that postponing Mr. Beaver's deposition from tomorrow to a date after the Court resolves the Fortalice issue would be best to avoid having him sit twice. We'd appreciate confirmation that the parties may schedule his deposition after the current fact discovery cutoff but promptly upon a decision by the Court regarding the Fortalice issue. We'd appreciate confirmation today so the parties can take the deposition off tomorrow's calendar.

Best,  
DC

---

**From:** Carey Miller <carey.miller@robbinsfirm.com>

**Date:** Wednesday, Jan 19, 2022, 10:26 AM

**To:** Gavin Palmer <Gavin\_Palmer@gand.uscourts.gov>, Cross, David D. <DCross@mofo.com>, Amanda Bradley <Amanda\_Bradley@gand.uscourts.gov>, Alexander Denton <Alexander.Denton@robbinsfirm.com>, bbrown@brucepbrownlaw.com <bbrown@brucepbrownlaw.com>, bjacoutot@taylorenghish.com <bjacoutot@taylorenghish.com>, Brian Lake <Brian.Lake@robbinsfirm.com>, btyson@taylorenghish.com <btyson@taylorenghish.com>, cheryl.ringer@fultoncountyga.gov <cheryl.ringer@fultoncountyga.gov>, cichter@ichterdavis.com <cichter@ichterdavis.com>, david.lowman@fultoncountyga.gov <david.lowman@fultoncountyga.gov>, dburton@taylorenghish.com <dburton@taylorenghish.com>, dlaross@taylorenghish.com <dlaross@taylorenghish.com>, Elson, Hannah R. <HElson@mofo.com>, hknapp@khlawfirm.com <hknapp@khlawfirm.com>, jballi@taylorenghish.com <jballi@taylorenghish.com>, Josh Belinfante <Josh.Belinfante@robbinsfirm.com>, jcrumly@taylorenghish.com <jcrumly@taylorenghish.com>, Javier Pico-Prats <javier.picoprats@robbinsfirm.com>, kaye.burwell@fultoncountyga.gov <kaye.burwell@fultoncountyga.gov>, lparadise@taylorenghish.com <lparadise@taylorenghish.com>, Melanie Johnson <melanie.johnson@robbinsfirm.com>, Kaiser, Mary <MKaiser@mofo.com>, ram@lawram.com <ram@lawram.com>, sparks@khlawfirm.com <sparks@khlawfirm.com>, Ascarrunz, Veronica <VAscarrunz@mofo.com>, Vincent Russo <vrusso@robbinsfirm.com>, Conaway, Jenna B. <JConaway@mofo.com>

**Cc:** Harry Martin <Harry\_Martin@gand.uscourts.gov>

**Subject:** RE: 17-cv-02989-AT Curling et al v. Raffensperger et al

**External Email**

Mr. Palmer:

The folder titled "Fortalice Reports to Plaintiffs' Counsel Pursuant to Subpoena" contains reports that Fortalice has already produced to Plaintiffs' counsel in response to their subpoena. In other words, reports which were not withheld and produced to Plaintiffs. The other folder, titled "Production of Final Reports Issued by Fortalice" contains documents that were identified from Fortalice's privilege log and are provided for *in camera* review pursuant to the Court's order; those reflecting either a final report or the last draft form of a report. Those documents have not been produced to Plaintiffs' counsel.

My apologies for the confusing folder names.

Carey A. Miller | 404.856.3286 | [ROBBINS](mailto:carey.miller@robbinsfirm.com)

---

**From:** Gavin Palmer [[mailto:Gavin\\_Palmer@gand.uscourts.gov](mailto:Gavin_Palmer@gand.uscourts.gov)]

**Sent:** Wednesday, January 19, 2022 9:19 AM

**To:** Cross, David D. <[DCross@mofo.com](mailto:DCross@mofo.com)>; Carey Miller <[carey.miller@robbinsfirm.com](mailto:carey.miller@robbinsfirm.com)>; Amanda Bradley <[Amanda\\_Bradley@gand.uscourts.gov](mailto:Amanda_Bradley@gand.uscourts.gov)>; Alexander Denton <[Alexander.Denton@robbinsfirm.com](mailto:Alexander.Denton@robbinsfirm.com)>; [bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com); [bjacoutot@taylorenghish.com](mailto:bjacoutot@taylorenghish.com); Brian Lake <[Brian.Lake@robbinsfirm.com](mailto:Brian.Lake@robbinsfirm.com)>; [btyson@taylorenghish.com](mailto:btyson@taylorenghish.com); [cheryl.ringer@fultoncountyga.gov](mailto:cheryl.ringer@fultoncountyga.gov); [cichter@ichterdavis.com](mailto:cichter@ichterdavis.com); [david.lowman@fultoncountyga.gov](mailto:david.lowman@fultoncountyga.gov); [dburton@taylorenghish.com](mailto:dburton@taylorenghish.com); [dlaross@taylorenghish.com](mailto:dlaross@taylorenghish.com); Elson, Hannah R. <[HElson@mofo.com](mailto:HElson@mofo.com)>; [hknapp@khlawfirm.com](mailto:hknapp@khlawfirm.com); [jballi@taylorenghish.com](mailto:jballi@taylorenghish.com); Josh Belinfante <[Josh.Belinfante@robbinsfirm.com](mailto:Josh.Belinfante@robbinsfirm.com)>; [jcrumly@taylorenghish.com](mailto:jcrumly@taylorenghish.com); Javier Pico-Prats <[javier.picoprats@robbinsfirm.com](mailto:javier.picoprats@robbinsfirm.com)>; [kaye.burwell@fultoncountyga.gov](mailto:kaye.burwell@fultoncountyga.gov); [lparadise@taylorenghish.com](mailto:lparadise@taylorenghish.com); Melanie Johnson <[melanie.johnson@robbinsfirm.com](mailto:melanie.johnson@robbinsfirm.com)>; Kaiser, Mary <[MKaiser@mofo.com](mailto:MKaiser@mofo.com)>; [ram@lawram.com](mailto:ram@lawram.com); [sparks@khlawfirm.com](mailto:sparks@khlawfirm.com); Ascarrunz, Veronica <[VAscarrunz@mofo.com](mailto:VAscarrunz@mofo.com)>; Vincent Russo <[vrusso@robbinsfirm.com](mailto:vrusso@robbinsfirm.com)>; Conaway, Jenna B. <[JConaway@mofo.com](mailto:JConaway@mofo.com)>

**Cc:** Harry Martin <[Harry\\_Martin@gand.uscourts.gov](mailto:Harry_Martin@gand.uscourts.gov)>

**Subject:** RE: 17-cv-02989-AT Curling et al v. Raffensperger et al

Counsel,

Regarding the discovery dispute Mr. Cross mentioned, could counsel for State Defendants please clarify what the folder described as "Fortalice Reports to Plaintiffs' Counsel" represents specifically? And, relatedly were any of the reports in that folder either also included in the folder entitled "Production of Final Reports Issued by Fortalice" or otherwise shared to Plaintiffs' counsel on an "attorney's eyes only" basis?

Gavin Palmer  
Law Clerk  
Chambers of the Honorable Amy Totenberg  
United States District Court for the Northern District of Georgia  
404-215-1436  
[Gavin\\_Palmer@gand.uscourts.gov](mailto:Gavin_Palmer@gand.uscourts.gov)

---

**From:** Cross, David D. <[DCross@mofo.com](mailto:DCross@mofo.com)>

**Sent:** Tuesday, January 18, 2022 11:26 AM

**To:** Carey Miller <[carey.miller@robbinsfirm.com](mailto:carey.miller@robbinsfirm.com)>; Amanda Bradley <[Amanda\\_Bradley@gand.uscourts.gov](mailto:Amanda_Bradley@gand.uscourts.gov)>; Alexander Denton <[Alexander.Denton@robbinsfirm.com](mailto:Alexander.Denton@robbinsfirm.com)>; [bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com); [bjacoutot@taylorenghish.com](mailto:bjacoutot@taylorenghish.com); Brian Lake <[Brian.Lake@robbinsfirm.com](mailto:Brian.Lake@robbinsfirm.com)>; [btyson@taylorenghish.com](mailto:btyson@taylorenghish.com); [cheryl.ringer@fultoncountyga.gov](mailto:cheryl.ringer@fultoncountyga.gov); [cichter@ichterdavis.com](mailto:cichter@ichterdavis.com); [david.lowman@fultoncountyga.gov](mailto:david.lowman@fultoncountyga.gov); [dburton@taylorenghish.com](mailto:dburton@taylorenghish.com); [dlaross@taylorenghish.com](mailto:dlaross@taylorenghish.com); Elson, Hannah R. <[HElson@mofo.com](mailto:HElson@mofo.com)>; [hknapp@khlawfirm.com](mailto:hknapp@khlawfirm.com); [jballi@taylorenghish.com](mailto:jballi@taylorenghish.com); Josh Belinfante <[Josh.Belinfante@robbinsfirm.com](mailto:Josh.Belinfante@robbinsfirm.com)>; [jcrumly@taylorenghish.com](mailto:jcrumly@taylorenghish.com); Javier Pico-Prats <[javier.picoprats@robbinsfirm.com](mailto:javier.picoprats@robbinsfirm.com)>;

[kaye.burwell@fultoncountyga.gov](mailto:kaye.burwell@fultoncountyga.gov); [iparadise@taylorenghish.com](mailto:iparadise@taylorenghish.com); Melanie Johnson  
<[melanie.johnson@robbinsfirm.com](mailto:melanie.johnson@robbinsfirm.com)>; Kaiser, Mary <[MKaiser@mofo.com](mailto:MKaiser@mofo.com)>; [ram@lawram.com](mailto:ram@lawram.com); [sparks@khlawfirm.com](mailto:sparks@khlawfirm.com);  
Ascarrunz, Veronica <[VAscarrunz@mofo.com](mailto:VAscarrunz@mofo.com)>; Vincent Russo <[vrusso@robbinsfirm.com](mailto:vrusso@robbinsfirm.com)>; Conaway, Jenna B.  
<[JConaway@mofo.com](mailto:JConaway@mofo.com)>  
Cc: Harry Martin <[Harry\\_Martin@gand.uscourts.gov](mailto:Harry_Martin@gand.uscourts.gov)>; Gavin Palmer <[Gavin\\_Palmer@gand.uscourts.gov](mailto:Gavin_Palmer@gand.uscourts.gov)>  
Subject: 17-cv-02989-AT Curling et al v. Raffensperger et al

**CAUTION - EXTERNAL:**

Ms. Bradley –

I’m following up regarding the Fortalice documents the Court is reviewing *in camera* provided by State Defendants. We needed to let the Court know that we’re deposing Merritt Beaver, the SOS CIO, this Thursday and the SOS 30(b)(6) deponent next Tuesday (we’re deposing David Hamilton, the former SOS CISO, today and we deposed James Oliver, the former SOS Security Manager, yesterday). We’re hoping to address any documents the Court orders produced in these upcoming depositions. We apologize for any imposition on the Court and appreciate whatever can be done to resolve this issue at the Court’s earliest convenience.

Best,  
DC

**DAVID D. CROSS**  
**CHAIR OF ANTITRUST LITIGATION PRACTICE**

Partner | Morrison & Foerster LLP

2100 L Street, NW, Suite 900 | Washington, DC 20037

P: +1 (202) 887-8795

[mofo.com](http://mofo.com) | [LinkedIn](#) | [Twitter](#)

=====

This message may be confidential and privileged. Use or disclosure by anyone other than an intended addressee is prohibited. If you received this message in error, please delete it and advise the sender by reply email. Learn about Morrison & Foerster LLP’s [Privacy Policy](#).

**CAUTION - EXTERNAL EMAIL:** This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.

=====

This message may be confidential and privileged. Use or disclosure by anyone other than an intended addressee is prohibited. If you received this message in error, please delete it and advise the sender by reply email. Learn about Morrison & Foerster LLP’s [Privacy Policy](#).

**CAUTION - EXTERNAL EMAIL:** This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.

=====

This message may be confidential and privileged. Use or disclosure by anyone other than an intended addressee is

prohibited. If you received this message in error, please delete it and advise the sender by reply email. Learn about Morrison & Foerster LLP's [Privacy Policy](#).

**CAUTION - EXTERNAL EMAIL:** This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.